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July 9, 1997

JUL 11 1997

Mr. Lester Snow  
Program Chairman  
Cal Fed Bay-Delta Program  
1416 Ninth Street, Suite 1148  
Sacramento, CA 95814

Re: CalFed Bay-Delta Program Storage and Conveyance Component  
Inventories (March 7, 1997)

Dear Mr. Snow:

We represent South San Joaquin Irrigation District ("SSJID") which is identified as a potential participant in the proposed conjunctive use program. Page B-16 of the report identified above cites SSJID as the source of at least 120,000 acre-feet per year of surface water by converting a major portion of its district to ground water. SSJID welcomes a program to reduce groundwater usage in the area to the north of it and agrees that this will improve groundwater levels inside SSJID. However, the Board of Directors of SSJID believes that the proposal for SSJID to switch to groundwater instead of surface water as the major source of its water supply is detrimental to water needs of San Joaquin County because of recent contracts designed to improve critical water shortages within the County and has such serious legal and practical impediments as to not be worth further consideration.

SSJID and Oakdale Irrigation District have recently entered into a contract with the Stockton East Water District for the sale of 30,000 acre-feet of surface water annually. In addition, SSJID has agreed to sell to Central San Joaquin Water Conservation District an additional 15,000 acre-feet of water annually. These are both long-term water sales. SSJID believes that the effect of both of these actions will be to assist in the recharge of the severely over drafted groundwater basin and assist in meeting the long-term surface water needs of the County. The environmental review process for the water sale is in process.

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SSJID has an agreement with the cities of Escalon and Manteca which are inside its district boundaries, and with the cities of Lathrop and Tracy, to supply treated surface water. The agreements require that SSJID build and operate a surface water treatment plant and supply treated water to the cities. The city of Ripon which is also in the district may join the project in the very near future. All of these cities currently rely upon groundwater, and in the case of Escalon, Manteca and Lathrop, rely exclusively on groundwater and are having water quality and/or salt water intrusion problems. The project will initially have a capacity of 36,000 acre-feet. The project is expected to have a particularly positive effect on groundwater levels, particularly in the Manteca area, which have declined in recent years. Agreements with the cities have been signed and the environmental review process will be starting soon.

SSJID groundwater management plan prepared in 1994 demonstrates that extensive conjunctive use already exists in the District. SSJID includes 72,000 acres. The anticipated safe yield of the District's underground was estimated to be 1 acre-foot per acre. The plan identified an existing network of recharge activities and groundwater use in the District. The extensive use of surface water in the District has continually recharged the underground basin. Cities have been major users of groundwater. In addition, it is estimated that approximately 1/5 of the acreage in SSJID is served by groundwater and is increasing. However, even with surface water recharge, the groundwater capacity within the District is not 100,000 acre-feet which is implied in the CalFed plan. This is not to say that in times of critical shortage of surface water SSJID would not rely upon its own pumps and upon agreements with area farmers to assist in meeting needs in the District, because it has done so in the past. However, this is not expected to be a major source for suppling the District's future water needs, both domestic and agricultural.

San Joaquin County has adopted a groundwater ordinance to protect its over drafted groundwater basin. The text of the ordinance prohibits the direct or indirect export of groundwater from the County without a permit. The permit process would be expected to be a major impediment to a conjunctive use program as proposed by CalFed. We would expect the County to take the position that the ordinance prohibits the District from participating in the conjunctive use program without a permit.

We request that CalFed reconsider the proposal on Page B-16 and delete it

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from the next edition due to the adverse impacts your proposal would have on meeting the unmet water needs of the South County area and on an already impacted basin.

If you have any questions feel free to call me.

Sincerely yours,

BRAY, GEIGER, RUDQUIST & NUSS

By: 

Steven P. Emrick

cc Mr. Richard Martin, General Manager  
Mr. Sergio Guillen, CalFed